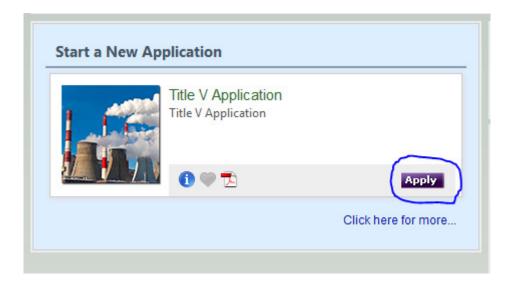
Starting a new Georgia Air Branch Title V Application

- 1. Login to GEOS
 - a. Website: https://geos.epd.georgia.gov/GA/GEOS/Public/EnSuite/Shared/Pages/Main/Login.aspx
- 2. Select "Apply" in the Start a New Application window.



Please submit <u>Title V Application</u> Data Entry Questions to:

David Matos, Chemicals Unit Manager - <u>David.matos@dnr.state.ga.us</u> 404-363-7127

Please place (GEOS) in the subject

ACCOUNT SETUP questions, RO certification, etc. e-mail contact EPD IT@dnr.state.ga.us

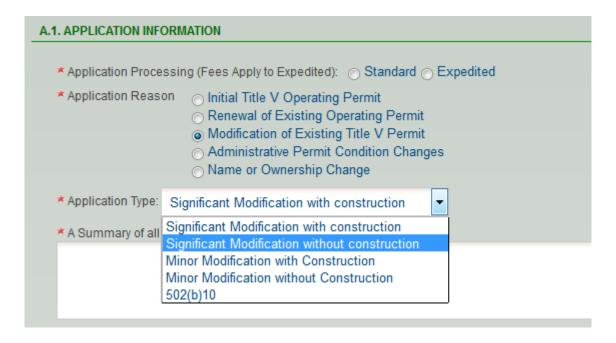
Section A. General Information

1. Fill out Section A and A.1

a. If you have any information that you deem CONFIDENTIAL or that you feel is not subject to disclosure under applicable Georgia Laws, please see the detailed instructions at the end of this guide. If the information is eligible then checkmark "Yes" and proceed as instructed in the attachment.



- b. This is where you will define the Construction Date and Describe the Overall Project
- c. Selection of Modification of Existing Title V Permit will allow for differentiation between Application Type.



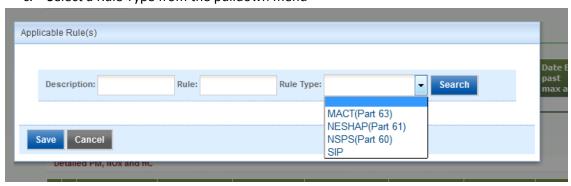
2. Select the facility you are applying for from the pulldown menu. This menu will be pre-populated via the FIS for sources assigned to you by your Responsible Official (RO).



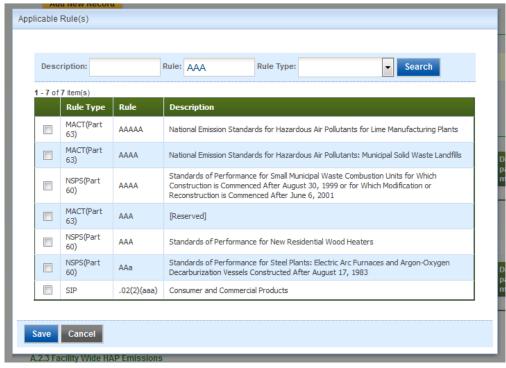
- 3. Answer the "Qualified Small Business" question and enter the SIC code (directly or using the pulldown menu). Enter the NAICS Code and Facility Description.
 - a. The correct SIC code is important so the application can be automatically routed to the appropriate work unit in the Air Branch.
- 4. Use the Add New Record button to add Significant Processes to the table.
 - a. These are the major overall groupings of equipment
 - b. Examples: Boiler Group 1, Storage Tanks, XYZ Production Line
- 5. Associate the rules that are applicable (or potentially applicable) to the entire facility
 - a. It is important to select all that are applicable since this will be the picklist for the associations with the emission units.
 - b. Select Associate Rule



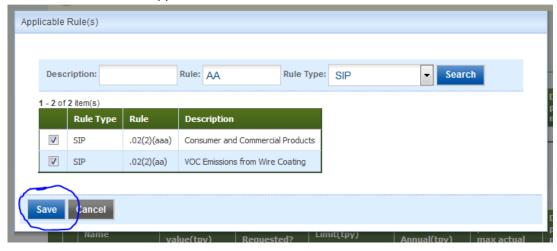
c. Select a Rule Type from the pulldown menu



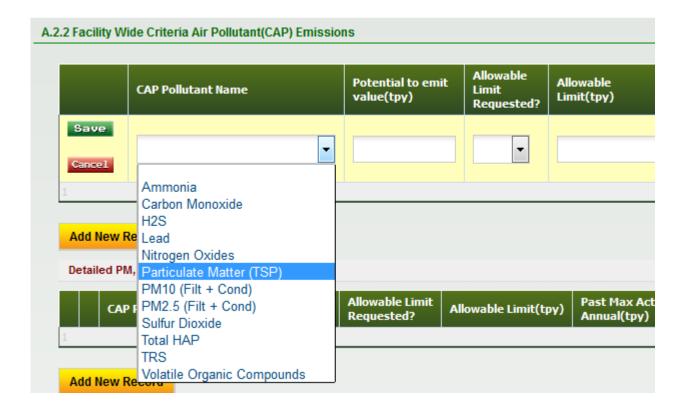
or search for a specific string (AAA)



d. Checkmark the Applicable Rules on the search result and hit save.



- e. Repeat as necessary until all rules added.
- 6. Enter your Facility Wide Criteria Air Pollutants using the "Add New Record" button.



- a. Enter PTE
- b. Specify whether or not an Allowable Limit is being requested. Enter the rest of the row if applicable.
- c. Remember to Click Save to add the row to the table.
- 7. Add Detailed PM, NOx and HC information (not required).
- 8. Add Detailed Facility Wide HAP Emissions (if present)
- 9. Add Detailed VOC Emissions
- 10. Check the Title VI applicability (if applicable).
- 11. CLICK SAVE or NEXT!!!!
 - a. It can never hurt to hit save!
 - b. I suggest you click it before you hit next (just to be safe)

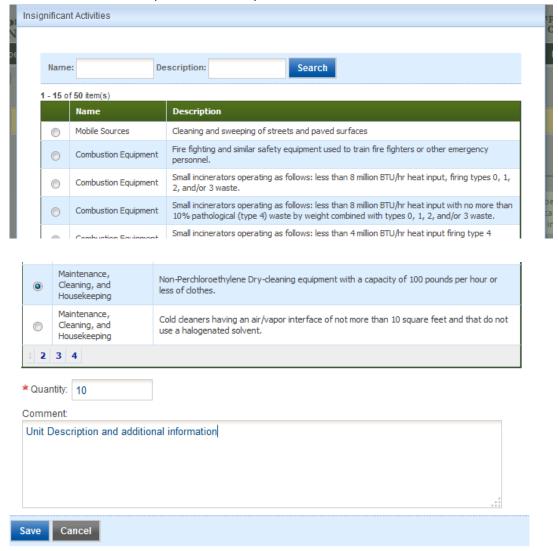


Section B: Contact Information

- 1. This section is self explanatory
 - a. If you run into an error, specifically with the Permit Contact while using Firefox or Chrome, then Hit Save and log in using Internet Explorer. You can save and then return to your browser of choice.

Section C: Miscellaneous Application Details

- 1. Insignificant Activities (C.1.1)
 - a. This is the same table that was at the end of the old Title V application
 - b. Click "Associate Insignificant Activity" and hit "Search"
 - i. A picklist of each Insignificant activity will appear.
 - ii. Select one and enter the number at the bottom of the page.
 - iii. Save and Repeat as necessary.



- 2. Add New Records as needed for each category in C.1.2
- 3. Add New Records for Generic Emissions Groups that are subject to only Georgia Rule (b), (e) and/or (n) in C.2.
- 4. Enter the number of Generic Fuel Burning Equipment in each category (Enter "0" if none)
- 5. Itemize any Short-term Activities
- 6. Detail any LDAR plans (if applicable).
- 7. CLICK SAVE or NEXT!!!!
 - c. It can never hurt to hit save!
 - d. I suggest you click it before you hit next (just to be safe)



Concept: Develop Emission Paths (Sections D – I)

The new Georgia Title V Application works on an "Emissions Path" concept. An emissions path is the process in which emissions are generated, controlled, and finally released to the atmosphere by a source. Emissions paths can be a single emission unit or a specific grouping of emission units. An emission source combined with release point(s) and/or control device(s) creates an emission path. The emission path is then defined as an emission path group in order to define emission summary, monitoring, and testing information. Multiple Control Devices can be related to a single emission source. Also, multiple release points can be related to the emission source and the apportionment defined through a simple percentage totaling 100% for all related release points.

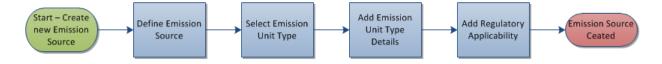
1.5.2 Emissions Path

The method to describe the generation of emissions and regulatory applicability and compliance has changed significantly from the previous versions of the Title V software. The method of permit writing and regulatory applicability should define how information is collected and grouped within the application. Therefore, through a series of stakeholder meetings with the permitting staff it was determined to use the following Emissions Path methodology to describe the relationship between emission units, release points, and control devices; and the method in which emission summaries, compliance monitoring, and testing are described.

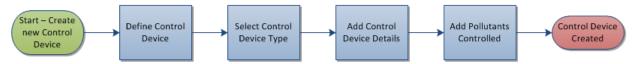
Generically, an emission unit(s) is an emission source. An emission source combined with release point(s) and/or control device(s) creates an emission path. The emission path is then defined as an emission path group in order to define emission summary, monitoring, and testing information.

The individual components for the emission path are as follows:

• Emissions Source – the point where the emissions are generated, single emission unit or a group of the same emission units, and assigned regulatory applicability. Regulatory applicability is selected from the facility-wide applicability or if a new regulation is added it is added to both the emission source and the facility-wide applicability.



Control Device(s) – Physical equipment that reduces the amount of emissions to the release point (optional)

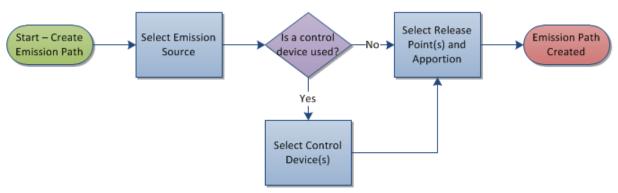


 Release Point(s) – Either a stack or fugitive location where the emissions are released into the atmosphere, allows for release point apportionment.



An emissions path is the process in which emissions are generated, controlled, and finally released to the atmosphere by a source. Emissions paths can be a single emission unit or a specific grouping of emission units. The fundamental components are as follows:

Figure 1: Emission Path



Multiple Control Devices can be related to a single emission source. Also, multiple release points can be related to the emission source and the apportionment defined through a simple percentage totaling 100% for all related release points.

1.5.3 Defining Group Applicability

The purpose and method of group identification is based on permit writing methodology and reduction in application documentation. The APB does not want to require applicants the undue burden of entering the same infrormation multiple times. However, this must be balanced with the need to accurately write an enforceable permit. Therefore, the APB Permitting Program came up with the following definitions.

- Single Emissions Path (SEP) Group single emission source with the associated control device(s) and release point(s)
- Common Control Device and Release Point (CD/RP) Group Emission sources that share the exact same control
 device(s) and release point(s) can be grouped. Possible scenario is a single RTO exiting through a single stack
 controlling multiple VOC emission sources
- Common Regulations (CReg) Group –Emission sources that have the exact same applicable regulations. Possible scenario, mineral crushing operations.
- Facility-Wide Group –

In order to build an emission path group an emission unit must be associated with at least one release point to create an emission source. To start, an emission source available for group identification is selected and it is first checked to see if there are any other emission sources available that have the exact same control device and release point relationships. If

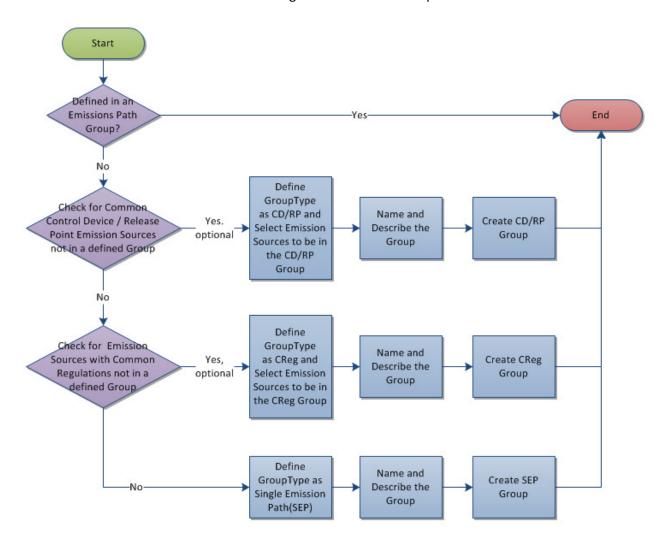
that is the case, then the user is given the opportunity to select those emission sources and identify them as a CD/RP Group.

If the user chooses to not use a CD/RP group or it is not available, the system determines if any other emission sources with the same regulatory applicability are available for grouping. If that is the case, then the user selects the emission sources they want in the group and defines it.

Lastly, if no grouping possibilities exist, then the user defines the emission source as a SEP Group.

Once an Emission Source is defined in an Emission Path Group it is no longer available for group assignments.

All Emission Sources must be defined in a single Emission Path Group.

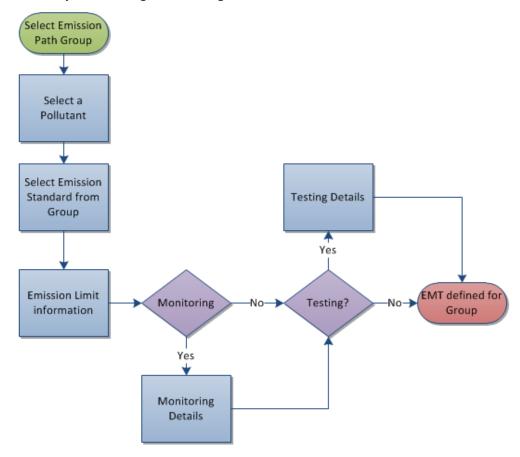


1.5.5 Group Emission Summaries, Monitoring, and Testing

Once an Emissions Group is defined, all Emission Summaries, Monitoring, and Testing data collection (see Figure 2) will apply to the entire Group. The categories are as follows:

- Single Emissions Path (SEP) Group all emissions, monitoring, and testing are applied to the single emission source.
- Common Control Device and Release Point (CD/RP) Group –All emissions, monitoring, and testing would be the same, and all emission limits and standards apply to each emission sources **combined**.
- Common Regulations (CReg) Group all emissions, monitoring, and testing would be the same, but emission limits/standards would apply to the **individual** sources in the group.
- Facility-Wide Group Does not contain any emission sources and can be added multiple times.

Figure 3: Emission Summary, Monitoring, and Testing



For each type of group, information is collected for Emissions, Monitoring and Testing on a per pollutant, per Applicable Regulation basis. Each group must have at least one Emission Summary pollutant, but Monitoring and Testing are optional.

1.5.6 Group Emission Summaries

For emission group, the common per pollutant emission summary information is as follows:

- a. Method used for calculate the emissions
- b. Maximum actual emissions for group in tons per year(tpy)
- c. Potential emissions for the group (tpy)
- d. Method of Calculation
- e. Voluntary Limit
- f. Work Practice
 - i. Name and Description

Each group must also have a certain characterization of the Emission Standard, but it does not necessarily require a unique field, just a difference in the way the field is described on the form.

For a Single Emission Path Grouping

a. Emission Limit/Standard for the emission source

For Common Regulation Group

- a. Display list of emission sources in the group
- b. Emission limit/standards for the **individual** emission sources in the group
- c. Emissions apportionment for the **individual** emission sources in the group based on a percentage (must total 100%)

CD/RP Group

- a. Display list of emission sources in the group
- b. Emission limit/standards for the all emission sources combined in the group

1.5.7 Emission Monitoring

For all emission groups, the per pollutant emission monitoring information is as follows:

- a. Monitoring Method
- b. Monitor Active
- c. Monitor Location
- d. Monitoring averaging time (units)
- e. Data Acquisition Frequency (in terms of readings per unit time)
 - i. Data points gathered per unit time
- f. Describe the types of records being kept with this monitoring
- g. Reporting frequency (time units)
- h. If multiple emission sources are in the associated group, indicate if this monitoring applies to all sources.
- i. Comments or other information about this monitoring

Monitoring details are applied to the group, but it does not necessarily mean that they are all the same, i.e. monitoring locations may change from source to source for a Common Regulation group.

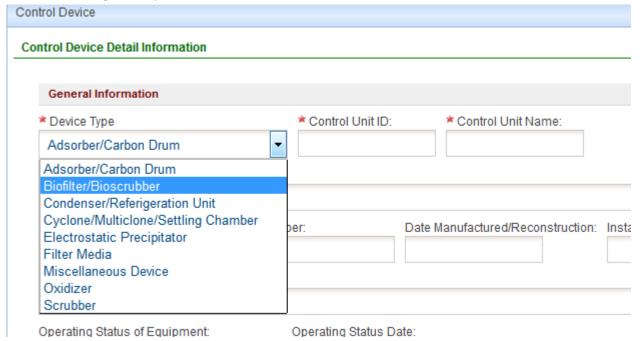
1.5.8 Emission Testing

For emission group the common emission testing information is as follows:

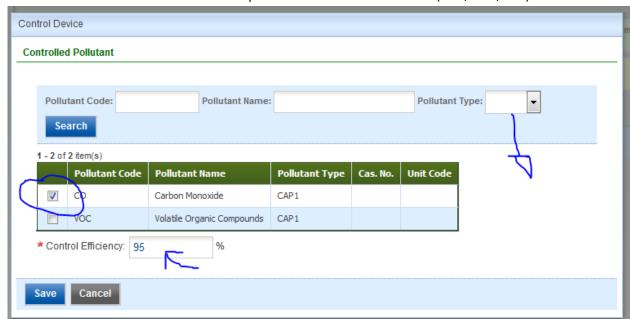
- a. Enter the frequency at which the test are required to be performed (per unit time)
- b. If multiple stacks are associated with this group, indicate if this test applies to multiple stacks in the group.
- c. Select the performance test method (PTM) from the list (dropdown)
- d. Applicable regulation selected from emission source(s) for this performance test

Section D: Control Devices

- Control Device(s) Physical equipment that reduces the amount of emissions to the release point (optional)
 - 1. Select "Add a New Control Device:
 - 2. Select Device Type using the pulldown menu.
 - a. Assign a unique Control Unit ID and Name



- b. Associate Controlled Pollutant
 - i. This will be based on the pollutants entered in Section A (CAP, HAP, etc.)



- 3. Repeat by selecting "Add New Control Device"
- 4. CLICK SAVE or NEXT !!!!



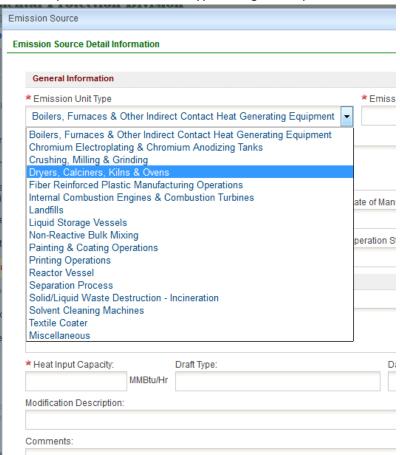
Section E: Release Points

Release Point(s) – Either a stack or fugitive location where the emissions are released into the atmosphere, allows for release point apportionment.

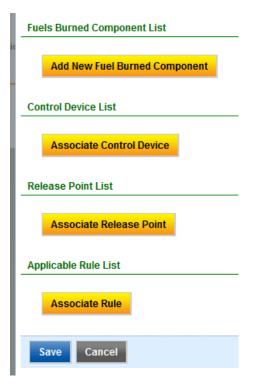
- Select "Add a New Release Point"
- 2. Assign your Release Point a unique ID and Name.
- 3. Define your Release Point
- 4. Repeat by selecting "Add New Control Device"
- 5. CLICK SAVE or NEXT!!!!

Section F: Emission Sources

- Select "Add a New Emission Source"
- 2. Select a Specific Emissions Unit Type. Assign a unique ID and Name.



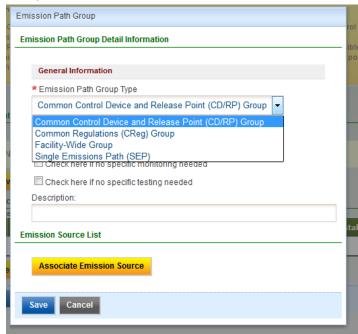
- 3. Fill in the required Information.
- 4. Hit "Save"
- 5. Add Fuel Burning Component List (if applicable)
- 6. Associate Control Device
- 7. Associate Release Point
- 8. Select the Applicable Rules
 - a. Rules populated by Section A input
- 9. Hit Save! Then hit Cancel to close popup.
- 10. Hit Save then Next on page with Table.



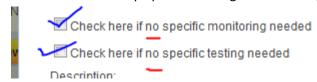
Section G: Emission Group

The emission path group will be used to define emission summary, monitoring, and testing information.

- Common Control Device and Release Point (CD/RP) Group Emission sources that share the exact same control device(s) and release point(s) can be grouped. Possible scenario is a single RTO exiting through a single stack controlling multiple VOC emission sources
- Common Regulations (CReg) Group –Emission sources that have the exact same applicable regulations. Possible scenario, mineral crushing operations.
- Single Emissions Path (SEP) Group single emission source with the associated control device(s) and release point(s)
- Facility-Wide Group
 - 1. Select "Add a New Emission Path Group"
 - 2. Use the Pull down menu to select the applicable type
 - a. Note if all units are separate then SEPs can be established on the "Add a New Emission Path Group" screen



b. Select whether Group Specific Testing or Monitoring is needed/included for this group.



- 3. Select the Units in this group from the Checkbox List
 - a. This list will be populated based on the type of group.
 - i. Common Control Device and Release Points will require matching CD/RPs
 - ii. Common Regulations will require matching Regulations
 - iii. SEPs are essentially individual unit "groups"
- 4. CLICK SAVE then NEXT !!!!

Section H: Emission & Activity

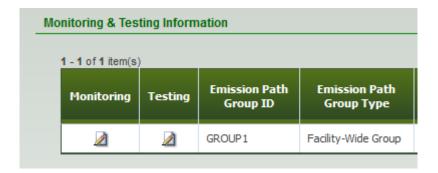
1. Add Group/Unit specific emissions data by selecting "edit" to add.



- 2. Click "Add Pollutant" and select from pulldown menu
- 3. Enter the specific Emission Limit/Standard and associated information.
- 4. Hit Save!

Section I: Monitoring and Testing

 If Group/Unit Specific Monitoring or Testing is required (or is being included) click under Monitoring or Testing for each Group.



- 2. Add Monitoring details for each pollutant
- 3. Add Testing details for each pollutant

Section J: CAM Plans

- 1. If there is a PSU that needs a CAM plan, fill out this section.
- 2. You will be directed to download the CAM forms from the old website and fill them out and upload them as an attachment.
- 3. This section should be only filled out for CAM applicable units and only for the specific Pollutant and Control Device.

Attachments, Validation and Submission

Note: The Attachments tab will not open unless "Next" is clicked from Section J: CAM Plans

- 1. Upload Attachments
- 2. A validation check will be run indicating any incomplete sections. You may click on the links and go back to that specific section and complete it.



3. Submit!

DETAILED INSTUCTIONS ON PROTECTED INFORMATION:

WHAT IS PROTECTED:

- 1. <u>ALL INFORMATION</u> "relating to <u>secret processes</u>, <u>devices</u>, or <u>methods of manufacture or production</u> obtained by the division". (O.C.G.A. 12-9-19). This applies regardless of WHEN or HOW the information was obtained—inspection, verbally, written. It does NOT require an affidavit. The law compels protection by EPD upon receipt of such information.
- 2. <u>OTHER INFORMATION THAT IS PROTECTED UNDER EXEMPTIONS TO THE GORA (O.C.G.A. 50-18-72).</u> For regulatory programs, this most commonly includes:
 - a. Records related to pending investigations
 - b. Information that is REQUIRED TO BE SUBMITTED that are Trade Secrets as defined by Article 27 of Chapter 1 of Title 10 that are not included in 1. above. This may include, but is not limited to, financial information, customer base, unit production rates.
 - For items submitted after April 17, 2012, protection requires submittal of an affidavit in accordance with O.C.G.A. 50-18-72 (a)(34) or a court order. Note: For Air Protection Records, trade secrets relating to <u>secret processes</u>, <u>devices</u>, or <u>methods of manufacture or production DO</u> <u>NOT REQUIRE AN AFFIDAVIT.</u>
 - ii. For items submitted prior to April 17, 2012, the responsibility for protecting this information lies with the agency. The Air Branch has a process in place for identifying that information.
 - c. Information that is attorney client privileged/attorney client work product. This includes but is not limited to communications between EPD and EPD counsel, or work products requested by EPD counsel (including contract counsel). It does NOT extend to communications between EPD and attorneys representing regulated entities.
- 3. INFORMATION that is determined to fall within 1 and 2 above is PROTECTED REGARDLESS OF ITS FORM. If the information is written or recorded in documents that EPD authors, for instance, it is still PROTECTED.

HOW TO ENTER PROTECTED INFORMATION IN GEOS?

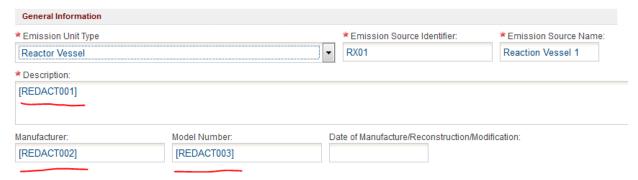
<u>All</u> information input and/or uploaded as attachments into the GEOS system should be considered Publically Available and should be treated that way by the Preparers.

If a Preparer feels that there is a need to include information not subject to disclosure (as defined above) an applicant should do the following:

1. Checkmark the box stating that "Information not subject to disclosure under the Georgia..." is included in the application.



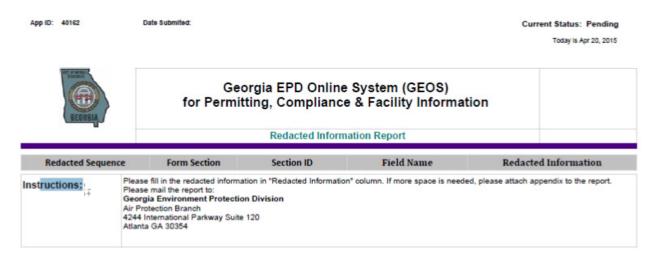
- 2. Instead of entering the Protected piece of information, the phrase [REDACT###] should be used in the entry field.
 - a. ### should be incremented by the Preparer for each subsequent piece of information that is "not subject to disclosure..."



- 3. Once the application is finished, the Preparer will be able to generate and download the "Redact Report" in the Attachment section.
 - a. This report will only be able to be submitted by Mail.

[INSERT SCREEN SHOT ONCE AVAILABLE]

- 4. The Prepare will then fill in the "Redacted Information" on the "Redact Report" with the Privileged Information, PRINT and MAIL it in to the Division in Paper form.
 - a. Do not include electronic versions of the Redact Report or any Privileged Information.



[UPDATE WITH SCREEN SHOTE OF FINAL VERSION]

5.	Once the Redact Report is received by the Division the information will be reviewed to make sure it meets the definitions listed above and the application the submittal will be marked complete by the assigned EPD staff member.